

1 TRACY L. WILKISON  
United States Attorney  
2 SCOTT M. GARRINGER  
Assistant United States Attorney  
3 Chief, Criminal Division  
JONATHAN GALATZAN  
4 Assistant United States Attorney  
Chief, Asset Forfeiture Section  
5 KATHARINE SCHONBACHLER (Cal Bar No. 222875)  
Assistant United States Attorney  
6 Asset Forfeiture Section  
United States Courthouse, 14<sup>th</sup> Floor  
7 312 North Spring Street  
Los Angeles, California 90012  
8 Telephone: (213) 894-3172  
Facsimile: (213) 894-0142  
9 E-mail: Katie.Schonbachler@usdoj.gov

10 Attorneys for  
UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT  
12  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 WESTERN DIVISION

15 IN THE MATTER OF THE SEIZURE OF  
\$381,370.00 IN U.S. CURRENCY,  
16 \$80,000.00 IN U.S. CURRENCY,  
\$267,907.89 IN BANK FUNDS,  
17 \$30,622.50 IN BANK FUNDS,  
\$21,182.07 IN BANK FUNDS, and  
18 26 ASSORTED PRECIOUS METALS

Case No. 2:22-CM-00088

STIPULATION TO EXTEND THE CIVIL  
FORFEITURE COMPLAINT FILING  
DEADLINE

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21  
22 On or about November 29, 2021, the Drug Enforcement Agency  
23 ("DEA") seized \$381,370.00 in U.S. Currency, \$80,000.00 in U.S.  
24 Currency and 26 assorted precious metals. On or about December 12,  
25 2021, the DEA seized \$267,907.89 in Bank Funds, \$30,622.50 in Bank  
26 Funds, and \$21,182.07 in Bank Funds. The property seized on November  
27 29, 2021 and December 12, 2021 is collectively referred to as "the  
28 seized property". The seized property was seized on the ground that

1 it constitutes or is traceable to one or more violations of Title 21  
2 of the United States Code. If the seized property constitutes or is  
3 traceable to these violations, it is subject to forfeiture to the  
4 United States.

5 Sandeep Singh Wadhwa ("claimant"), through his counsel, denies  
6 that the seized property was involved in said crimes, and has timely  
7 submitted administrative claims with the DEA, contesting the  
8 forfeiture of the seized property.

9 The DEA has referred this matter to the U.S. Attorney's Office  
10 for the Central District of California for civil judicial forfeiture  
11 consideration. Pursuant to 18 U.S.C. § 983(a)(3)(A)-(C), the deadline  
12 for filing a civil forfeiture complaint against the property seized on  
13 November 29, 2021 is May 15, 2022, and the deadline for filing a civil  
14 forfeiture complaint against the property seized on December 12, 2021  
15 is May 23, 2022, but the statute provides for an extension of that  
16 date by court order upon agreement of the parties.

17 By this stipulation, the parties seek to continue the deadlines  
18 for filing a civil forfeiture complaint against the seized property  
19 because the parties would like additional time to discuss if a pre-  
20 filing resolution is possible.

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1 IT IS THEREFORE STIPULATED by and between the United States and  
2 counsel for claimant, that the government's time to file a civil  
3 forfeiture complaint in connection with the seizures of all of the  
4 seized property be extended up to and including July 29, 2022.

5 Dated: May 10, 2022

Respectfully submitted,

6 TRACY L. WILKISON  
United States Attorney  
7 SCOTT M. GARRINGER  
Assistant United States Attorney  
8 Chief, Criminal Division  
JONATHAN GALATZAN  
9 Assistant United States Attorney  
Chief, Asset Forfeiture Section  
10

11 /s/Katharine Schonbachler  
KATHARINE SCHONBACHLER  
12 Assistant United States Attorney

13 Attorneys for  
14 UNITED STATES OF AMERICA

15 Dated: May 9, 2022

ALALEH KAMRAN, ATTORNEY AT LAW

17 /s/per email auathorization  
ALALEH KAMRAN, ESQ.  
18

19 Attorney for Claimant  
SANDEEP SINGH WADHWA  
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**PROOF OF SERVICE**

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 312 North Spring Street, 14th Floor, Los Angeles, California 90012.

On **May 10, 2022**, I served a copy of: **STIPULATION TO EXTEND THE CIVIL FORFEITURE COMPLAINT FILING DEADLINE** on each person or entity named below.

☒ By Electronic Mail: By transmitting said document(s) to the email address(es) listed below.

**TO: Alaleh Kamran, Attorney at Law  
A Professional Corporation  
15760 Ventura Blvd, 16th Floor  
Encino, CA 91436  
[alalehkamran@alalehkamran.com](mailto:alalehkamran@alalehkamran.com)**

**Attorney for Claimant  
Sandeep Singh Wadhwa**

I declare under penalty of perjury under the laws of the United States of America that I am employed in the office of a member of the bar of this Court, at whose direction the service was made, and that the foregoing is true and correct.

Executed on **May 10, 2022**, at Los Angeles, California.

/s/Tara B. Vavere

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TARA B. VAVERE  
Paralegal, FSA